## OSBORN LAW P.C.

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March 20, 2024

## **VIA ECF**

Honorable Jennifer E. Willis United States District Court Southern District of New York 40 Foley Square New York, NY 10007

> Re: Page v. Commissioner of Social Security Civil Action No. 1:23-cv-10233-JW

Dear Judge Willis,

We write on behalf of plaintiff, Cassandra Alesia Page, and with the consent of the defendant, to request an extension of time to serve plaintiff's written settlement proposal per the Court's November 23, 2023 Scheduling Order. Plaintiff's written settlement proposal is due on March 27, 2024. This is the parties' first request for an extension. The reason for this request is that Plaintiff's counsel currently has overlapping Social Security brief deadlines and Oral Arguments in the next two weeks.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- a. Defendant served the Administrative Transcript via hard copy on February 26, 2024;
- b. Plaintiff to serve a written settlement proposal on April 26, 2024;
- c. The parties file a stipulation remanding, dismissing, or resolving the case or file joint letter advising the Court that they were unable to resolve the case on or before May 27, 2024;

Honorable Jennifer E. Willis March 20, 2024 Page Two

- d. Plaintiff to file her motion for judgment on the pleadings on or before **July 26, 2024**;
- e. Defendant to file its response/cross-motion on or before **September 24**, **2024**; and
- f. Plaintiff to file her reply (if any) on or before October 8, 2024.

Thank you for your consideration of this request.

E. Willis

This request is GRANTED. SO ORDERED.

Jennifer E. Willis

United States Magistrate Judge

April 2, 2024

Respectfully submitted,

s/Daniel A. Osborn

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cc: Jonathan King, Esq. (by ECF)